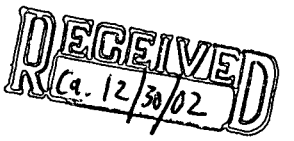
John H. Randolph
13 Baldwin Road
Saddle River, New Jersey 07458

December 26, 2002



Seth Ausubel
Remedial Project Manager
United States Environmental Protection Agency
Region 2
Emergency and Remedial Response Division
290 Broadway, 19th Floor
New York, NY 10007-1866

Dear Mr. Seth Ausubel,

Randolph Products Co. was sold and is in the ECRA process. We were a small family owned company. Currently my sister and I own the land. I have no staff to answer this. I have done my best on it.

1) Altje, Inc is the company that was formed to hold the land for sale. You should use my home address which is
   a. 13 Baldwin Rd, Saddle River, NJ 07458

   b. Corporation in the State of New Jersey

   c. The owners are John H. Randolph,13 Baldwin Road, Saddle River, NJ 07458. I own about 54 % of Altje Inc. My sister Joanna A. Randolph owns about 46 % of Altje Corporation, Her address is 134 Reldys Ave, Leonia, NJ 07605

   d. We were a family owned business not related to another company.

   e. Date of incorporation was about 8/2001 in New Jersey

   f. We were Randolph Products but sold on Jan 14, 2002. The ownership was as above in answer c.

2) The property is Woodridge Block 229 lot 9 and Carlstadt Block 84 Lot 1 about 3 acres

3) The former company was owned and operated by my father until his death when it was split between his children. Randolph Products made industrial paints. Altje Inc has a short time lease with the new owners.

4) The lease is for 18 months starting January 14, 2002 . I cannot find the final copy of the lease but am enclosing a copy of what it is for the details. I am sorry for the delay but I can't find the final copy but all of the information in is the work copy. I have been delayed in answering this because I am home and do not have a copy machine for legal size paper. I do not want to delay this answer by looking further. It was leased to C & C Ventures, LLC ,7082 Ivanrest, Byron Center, Michigan 493151

5) 2 story brick building on industrial site. C & C Ventures, LLC continued the paint manufacturing.

6) The buyer of Randolph Products took over the business, name of company and the contents of the building. He is moving out of state. Randolph made industrial paint.

a. Paint Mfr

b. Government paint, Aircraft paint and General industrial paint were made.

c. We had a lab that tested and produced paint formulas.

d. The old Randolph Products Co had a lab from 1938 . Altje, Inc. does nothing except hold the property for sale.

7) Altje, Inc is a landlord and does no production or sales. It is; however, disposing of some old paint which was left over. This is stored inside and is being disposed of by West Central Environmental Corporation EPA ID # NYD000708271

8) Operating Permit Program
Air Quality Permit
Hazardous Material Transportation
Annual Life Hazard
NJ Pollutant Discharge Elimination System

9) Hazardous materials list:

RAWCODE	TNAME	CAS	F	H	R	PP
AAF100000000	HYDROQUINONE/ TECHNICAL	123-31-9	1	1	1	X
AAF500000000	METHYL ZIMATE	137-30-4	1	2	0	
AAF700000000	BUSAN 1025	N/A	2	3	1	
AAF800000000	BUSAN 11-M1	13701-59-2	0	1	0	X
AAP100000000	CHLOR POLYOLEFIN 343-3 25% XYL	MIXTURE	3	2	0	I
AAS404000000	MULTIFLOW RESIN	N/A	3	2	0	I
AAS410000000	M-P-A 2000X ANTI SETTLE AGENT	1330-20-7(2)	3	2	0	X
AAS415000000	SAG-10	N/A	3	2	0	X
AAS416000000	TROYTHIX ANTI-SAG 4	N/A	3	2	0	X
AAS500000000	ASA-SKINO #2,EXKIN #2	96-29-7	2	3	1	B
AAS650000000	LACTIMON	N/A	3	2	0	I
AAS720000000	DISPERBYK 163	N/A	3	1	0	B
AAS740000000	ANTI-TERRA 207	N/A MIXTURE	3	1	0	X
AAS750000000	ANTI-TERRA P	N/A	2	2	0	X
AAS770000000	DEHYDRAN 1293 (HENKEL)	N/A	3	2	0	I
AAS780000000	LACTIMON-WS (BYK CHEMIE)	N/A	3	2	0	I
AAS800000000	BEETLE 216-8	68002-19-7	3	2	0	X
ACA200000000	K-CURE 129 B	N/A	3	3	1	
ACA210000000	K-CURE 1040	N/A	3	3	1	D
ACB200000000	ETHYL ACID PHOSPHATE	N/A	1	2	1	
ACB300000000	4040 CYCAT CATALYST	N/A	3	2	2	I
ACB400000000	NACURE 1323	N/A	3	2	1	H
ACB500000000	VESTURIT BL 1203	N/A	2	1	1	
ACI100000000	IRGACOR 153	N/A MIXTURE	3	3	0	X
ACP100000000	MONDUR CB-75	N/A	3	2	1	X
ACP200000000	U-110A MOISTURE CURING POLYURE	N/A	2	2	0	X
ACU100000000	T-12 ACTIVATOR	N/A	1	3	0	

ACW100000000	PHOSPHORIC ACID 85%	7664-38-2	0	3	0	X
ACW200000000	ACETIC ACID	64-19-7	1	2	1	X
ACX100000000	DEH 24 EPOXY CURING AGENT	00012-24-3	0	0	0	X
ACX200000000	DMEA * DIMETHYLAMINOETHANOL	108-01-0	2	2	0	
ACX300000000	EPICURE 3214 *C-112 CURING AGE	N/A	3	4	0	X
ACX350000000	EPOTUF 37-680	N/A	0	2	0	X
ACX370000000	EPICURE 3213 CURING AGENT	N/A	3	4	0	X
ACX400000000	ETHYLAMINE 70%	75-04-7	0	0	0	
ACX700000000	BUTYL ACID PHOSPHATE	1623-15-0	1	3	1	I
ACX800000000	METHYL ACID PHOSPHATE	N/A	1	3	1	I
ADF100000000	DEHYDRAN ARA7219	N/A	3	1	0	
ADF300000000	PATCOTE 519	N/A	2	2	0	
ADF400000000	DEHYDRAN 671	N/A	2	2	0	
ADR100000000	ACTIV 8*	N/A	2	3	1	
ADR150000000	NEOCHEM 250		2	2	0	X
ADR200000000	CALCIUM NAPHTHENATE 4%	61789-36-4	2	2	0	X
ADR300000000	COBALT 12 %	N/A	2	1	0	
ADR400000000	MANGANESE NAP-ALL 6%	N/A	2	2	0	
ADR450000000	MANG.HYDRO-CURE II (NOTE30)	N/A	2	2	0	H
ADR500000000	ZINC NAPTHENATE 8%	N/A	2	1	0	
ADR600000000	ZINC OCTOATE 8% HEX-CEM 809	N/A	2	1	0	
ADR700000000	ZIRCONIUM (TROY MAX) 18%	39049-04-2	2	1	0	
ADR750000000	ZIRCONIUM 12% HYDRO-CEM	N/A	2	1	0	E
ADR800000000	COBALT 5% HYDROCURE II	N/A	2	1	0	E
ADR900000000	COPPER 8% NAP-ALL	N/A	2	2	0	B
APR200000000	NEUOSEPT 95 PRESERVATIVE	N/A	2	3	0	X
ASB100000000	DIETHYLAMINE (DETN)	109-89-7	0	0	0	
ASB200000000	TEA * TRIETHYLAMINE	121-44-8	3	2	1	
ASB220000000	TRIETHANOLAMINE 85% (NOTE 14)	N/A	0	2	1	X
ASC100000000	DOW 11 PAINT ADDITIVE	N/A	3	2	0	H
ASC210000000	DOW CORNING 200 FLUID	63148-62-9	1	1	0	
ASC220000000	RAYBO 26 SLIKIT 26	PROP.	2	1	0	X
ASC400000000	HYDROFLO 62 RAYBO	68938-54-5	1	2	0	X
ASC750000000	SLIP-AYD SL-404 POLYMERIC WAX	N/A	2	2	1	X
ASC800000000	TROYSOL S366	N/A	2	1	0	H
ASC900000000	ANCAMINE K54 *DMP-30	90-72-2	1	3	0	I
ASF110000000	BYK P-104S	N/A	3	1	0	X
ASF120000000	BYK 306	N/A	3	1	0	
ASF125000000	BYK 370	NA	3	2	0	I
ASF140000000	BYK 346	N/A	1	2	0	X
ASF150000000	BYK 310	N/A	3	1	0	B
ASF160000000	BYK 451	PROP.	3	2	0	B
ASF16500000	BYK 300	N/A	3	2	0	I
ASF170000000	BYK 450 CATALYST	N/A	3	1	0	B
ASF192000000	BYK 020	N/A	3	2	0	I
ASF200000000	SF 69	63148-62-9	1	0	0	X
ASF250000000	SF 1023	N/A	0	0	0	I
ASF300000000	DOW 3 * DOW CORNING 3	N/A	3	2	0	X
ASF400000000	ADDITOL XL 480 (NEW)	N/A	2	2	0	
ASF500000000	ADDITOL XW395	N/A	3	2	0	I
ASH100000000	HAMMERTONE ADDITIVE 730K	N/A	2	1	1	X
ASZ100000000	MALEIC ANHYDRIDE	180-31-6	1	2	2	
AWA100000000	AMP-95	124-68-5	0	3	0	X
AWA200000000	DUOMEEN TDO	61791-53-5	1	3	0	I
AWA350000000	FLUORAD FC-430 ADDITIVE	N/A	3	2	0	X
AWA400000000	SURFYNOL 104 E	N/A	1	2	0	

AWA405000000	SURFYNOL 104BC SURFACTANT	N/A	1	2	0	X
AXB100000000	AQUA AMMONIUM 26%	1336-21-6	1	3	0	X
AXC100000000	CAUSTIC SODA	1310-73-2	0	1	1	
AXX150000000	CATAFOR CA 80 (CAT80)	N/A	3	1	1	X
AXX300000000	COBRATEC 99 POWDER	95-14-7	0	2	0	E
AXX400000000	UVINUL 493 *490 (TO BE REPLACE	131-54-4	0	0	0	
AXX720000000	TINUVIN 1130	104810-48-2	0	2	0	X
AXX750000000	TINUVIN 292 SD	41556-26-7	3	1	0	
AXX770000000	LA 5363 ADHESIVE	N/A MIXTURE	3	3	0	X
AXX780000000	PAINT REMOVER		0	3	0	X
D-B200000000	LUXOL BLUE MBSN	1328-51-4	0	0	0	
D-N500000000	SPECTRASOL BLACK 13	12769-14-1	0	1	0	D
D-N600000000	ZAPON BLACK NB X51A DYE	N/A MIXTURE	3	2	0	X
D-O200000000	OIL ORANGE 205	842-07-9	0	0	0	
D-O400000000	SAVINYL ORANGE RLS	N/A	1	1	0	
D-O700000000	ZAPON ORANGE NB251A DYE	N/A MIXTURE	3	2	0	X
D-R200000000	OIL RED PYLAM LIQUID LO 2109	N/A	3	2	0	I
D-R350000000	ORASOL RED G	N/A	1	0	0	X
D-R500000000	RHODAMINE 6-G	N/A	0	0	0	
D-R600000000	RHODAMINE B CONCENTRATE / POWD	81-88-9	0	0	0	
D-R700000000	SAVINYL RED BLSN	PROP.	1	1	0	
D-R750000000	ZAPON RED NB335A DYE	N/A MIXTURE	3	2	0	X
D-R800000000	SCARLET RLS SAVINYL	PROP.	1	1	0	
D-R900000000	SPECTRAZINE RED GRL CONC A-28	N/A	0	1	0	D
D-R950000000	A-27 AWS DK RED MAHOGANY A5004	N/A	0	1	0	D
D-T100000000	SAVINYL BROWN GLS	PROP.	1	1	0	X
D-T400000000	SAVINYL BROWN 4RLSN *ACETOSOL	N/A	3	1	0	X
D-T500000000	BERNOIL BROWN SGN		3	1	0	X
D-T990000000	BROWN DYE	N/A	1	1	0	X
D-Y600000000	ZAPON YELLOW NB157A DYE	N/A MIXTURE	3	2	0	X
FAS200000000	ALUMINIUM STEARATE	637-12-7	1	0	0	
FMM100000000	MICA C-3000		0	0	0	I
FSD220000000	SILVERBOND B	14808-60-7	0	2	0	X
FZS100000000	ZINC STEARATE DLG-20A	557-05-1	4	1	0	
P/1000000000	FAXAM 22 (WAS FORUM 40)	64742-65-0	1	1	0	X
P/1500000000	DOP	117-81-7	1	1	0	X
P/2500000000	LUSTRALITE 44-444	N/A	2	2	0	H
P/3500000000	RAW LINSEED OIL 100%	8001-26-1	1	0	0	X
P/5000000000	TPP SOLID TRIPHENYL PHOSPHATE	115-86-6	1	2	0	X
P/7000000000	SANTICIZER 160 PLASTICIZER	85-68-7	1	1	0	X
P/8000000000	SAIB-90	N/A	3	2	0	
P/9000000000	CAMPHOR USO (2-BORNANONE)	76-22-2	3	2	0	I
PDB100000000	PHTHALO BLUE 4800V UCD (*4830N	N/A	2	1	0	B
PDB120000000	PHTHALO BLUE 4820 UCD	64742-88-7	2	2	0	B
PDB140000000	PHTHALO BLUE 50-1202	N/A	2	1	1	X
PDB300000000	IRON BLUE 5S44*50-1077 NC PAS	N/A	2	0	0	I
PDB350000000	BLUE 5S 775-D N/C PASTE	NA/ MIXTURE	3	2	1	B
PDB500000000	853-7210 PHTHALO BLUE ACRY/UR	N/A	3	2	0	I
PDG10T000000	CHROME GREEN 50-1 *SEE MSDS*	N/A	1	2	2	X
PDG200000000	GREEN 50-1168 N/C DISPERSION	50-1168	3	2	1	X
PDG300000000	PHTH GREEN 5G900D *50-1083	N/A	2	2	1	X
PDG350000000	PHTHALO GREEN TINT-AYD ST 8703	N/A	2	2	1	H
PDG500000000	853-5510 PHTHALO GREEN ACRY/UR	N/A	3	2	0	I
PDM100000000	MAROON 5R161D *50-1147	N/A	2	1	0	I
PDM200000000	MAROON 5R196 *50-6232	N/A	2	1	1	X
PDN100000000	CARBON BLACK N/C CHIP 848458 C	N/A	2	0	0	X
PDN200000000	BLACK TINT AYD ST-8317		2	2	1	H

PDN350000000	853-9915 BLACK, JET ACR/UR	N/A	3	2	0	I
PDN450000000	853-9920 LAMPBLACK ACR/UR	N/A	3	2	0	I
PDN600000000	FURNACE BLACK 50-5352 VINYL PA	N/A	3	2	0	X
PDO200000000	DINITROANILINE ORANGE 6Y65	N/A	2	1	1	I
PDO30T000000	MOLY ORANGE 6120N UCD *SEE MSD	N/A	2	2	1	X
PDO400000000	ORANGE 5Y422 *50-840	N/A	1	1	1	X
PDO500000000	ORANGE, LEAD FREE 844-0982	N/A	2	1	0	X
PDO800000000	853-6120 MOLY ORANGE ACRY URET	N/A	3	2	0	I
PDP100000000	PEARLIZED-MEARLITE ULTRA BRIGH	N/A	3	2	1	X
PDR100000000	BON RED NC 6R17D *50-1110	N/A	2	2	1	I
PDR350000000	RED 6R92,*50-206 SCARLET (SA/U	N/A	2	2	0	X
PDR400000000	LITHOL RUBINE 6R219D *50-1209	N/A	1	0	0	I
PDR450000000	RED TINT AYD ST 8673 DEEP ORGA	N/A	2	2	1	H
PDR500000000	50-148 RED IRON OX(NOTE 10)	N/A	3	1	0	X
PDR610000000	TRANS RED OXIDE UCD UCD5891D	N/A	3	1	0	X
PDR650000000	TRANS-OX RED 10-5C-42-A127	8011-97-0	2	2	0	X
PDR700000000	6R1107 2B RED*50-11481	N/A	2	1	0	X
PDR750000000	853-1010 RED OXIDE ACRY/URETH	N/A	3	2	0	I
PDR800000000	RED 50-6261 TOLUIDINE RED	N/A	2	1	1	X
PDT100000000	BURNT UMBER 6N84 *50-6263	N/A	4	0	0	X
PDT200000000	ST-8509 BURNT UMBER DISPERSION	N/A	3	2	0	I
PDT300000000	ST-8507 RAW UMBER DISPERSION	N/A	3	2	0	I
PDV100000000	ST-8115 QUINACRIDONE VIOLET DI		1	1	1	X
PDV200000000	853-9420 QUINDO VIOLET ACR URE	N/A	3	2	0	I
PDV500000000	ST-8119 CARBIZOL VIOLET DISPER	N/A	1	1	1	I
PDY100000000	50-1178 DIARYLIDE YELLOW	50-1178	2	1	2	X
PDY150000000	6Y411 DIARYLIDE YELLOW N/C PAS	N/A MIXTURE	3	2	1	B
PDY180000000	853-2510 LT CHR YELL ACRY	N/A	2	3	0	I
PDY210000000	6Y352 HANSA YELLOW RS N/C PAST	N/A	3	2	1	B
PDY250000000	853-1810 YELL OX ACRY/UR	N/A	3	2	0	I
PDY300000000	6Y326 MAPICO YELLOW *50-208	N/A	2	3	2	X
PDY450000000	50-2395 GOLD (*50-2344 MIDAS G	N/A	3	2	0	X
PDY500000000	MIDAS GOLD 16Y721 *50-9106289	N/A	4	1	1	I
PDY600000000	TRANOXID YELLOW 105C42A208	51374-00-1	2	1	0	X
PFO400000000	GSS305 ORANGE PHOSPHORESCENT P	68611-70-1	0	0	0	E
PFR600000000	GSS503 PINK PHOSPHORSCENT PIGM	N/A	0	0	0	E
PFY200000000	GSS205 YELLOW PHOSPHORSCENT PI	68611-70-1	0	0	0	E
P-M100000000	FANCHON MAROON MV70139 NOTE18	N/A	0	2	0	X
P-M110000000	MV6604 THIOSA FAST RED (DEEP B	N/A	0	2	0	X
P-MA10000000	ALUMINUM PASTE 40-LN NON-LEAFI	7429-90-5	2	2	1	
P-MA11000000	ALUM.6-235 NL	7429-90-5	2	1	1	X
P-MA12000000	ALUM.PASTE 30LN/37LN (NL)	7429-90-5	2	2	1	X
P-MA13000000	ALUMINUM PASTE 6221 NON LEAFIN	7429-90-5	0	1	0	X
P-MA14000000	ALUMINUM PASTE 226 NON LEAFING	N/A	2	2	1	X
P-MA15000000	ALUMINUM PASTE #222 NON LEAFIN	7429-90-5	2	2	1	X
P-MA20000000	ALUMINUM PASTE STAMFORD "GH"	7429-90-5	2	2	1	
P-MA23000000	A6240/STAMFORD P/NOTE 11	7429-90-5	2	2	1	X
P-MA25000000	7058 ALUM.PASTE CB200*6571	7429-90-5	2	2	1	X
P-MA30000000	SPARKLE SILVER 3666-NON LEAFIN	7429-90-5	2	2	1	X
P-MA35000000	ALUMINUM PASTE 6205(NOTE 11)	7429-90-5	2	2	1	X
P-MA40000000	ALUMINUM POWDER 4-591	7429-90-5	0	2	0	
P-MA50000000	ALUMINUM POWD.30XD(NOTE11)	7429-90-5	0	2	0	X
P-MG10000000	PALE GOLD SF-50	N/A	1	0	0	X
P-MG41000000	RICHGOLD 8620	N/A	0	1	1	E
P-MS10000000	SS STD LEAFNG STAINLESS STEEL	N/A	1	2	0	X
P-MS15000000	SS FINE LEAFNG STAINLESS STEEL	N/A	1	2	0	X
P-MS16000000	SS FINE WATER GRADE STAINLES S	N/A	1	2	0	X

P-O30T000000	MOLYBDATE ORANGE YE998LD	12656-85-8	0	1	0	0
P-P100000000	PEARLY PIGMENT ENC	N/A	1	3	0	
P-P200000000	PEARLY PIGMENT NC	N/A	1	3	0	X
P-P300000000	PEARLY PIGMENT XNC	N/A	1	3	0	X
PWB500000000	CW-5228 PHTHALO BLUE TINT-AYD	N/A	1	1	0	H
PWG100000000	CW-5703 PHTHALO GREEN TINT-AYD	N/A	1	1	0	H
PWN400000000	T-1148C BLACK AQUEOUS DISPERSI	N/A	0	2	0	X
PWN600000000	CW-5317 TINTING BLACK TINT-AYD	N/A	1	2	0	H
PWO700000000	CW-5619 DIARYLIDE ORANGE TINT-	N/A	1	1	0	H
PWR670000000	CW-5673 DEEP ORGANIC RED TINT-	N/A	1	1	0	H
PWR770000000	CW-5611 RED OXIDE MED.TINT-AYD	N/A	1	1	0	H
PWY600000000	CW-5451 LT LEMON YELLOW OX. TI	N/A	1	1	0	H
PWY620000000	CW-5466 ISOINDOLINE YELLOW (R)	N/A	1	1	0	H
P-Y12T000000	ZINC CHROMATE J 1310	11103-86-9	1	3	0	E
P-Y13T000000	ZINC CHROMATE J-1345 BASIC	13530-65-9	0	4	0	E
P-Y240000000	YELLOW LIGHT 8G	8007-18-9	0	1	0	X
P-Y50T000000	YELLOW LIGHT 3KY781D	13344-37-2	0	1	0	X
RAA050000000	PARALOID AT-63 50%	N/A	3	2	0	I
RAA060000000	EPS 7711 *ACRYLAMAC 232-1120	N/A	3	2	0	I
RAA100000000	PARALOID AT-81 ACRYLOID	N/A	2	2	0	I
RAA125000000	PARALOID B48N100%(DO NOT BUY)	N/A	1	1	0	J
RAA130000000	PARALOID B-82 51%	N/A	3	2	0	I
RAA140000000	PARALOID B-67 45% / UCD34	N/A	3	1	0	I
RAA150000000	B-44S ACRYLOID (UCD56) NOTE 7	N/A	3	2	0	X
RAA160000000	PARALOID A-101 40%	N/A	3	2	0	I
RAA170000000	PARALOID F-10 40%	N/A	2	2	0	I
RAA300000000	AMBERLAC 13-802(292-X) RESIN	N/A	3	1	0	X
RAA350000000	AMBERLAC 13-502	N/A	3	2	0	I
RAA400000000	PARALOID AU608S SEE RLG*UCD887	N/A	2	2	0	I
RAA500000000	UCD 427M1	N/A	3	2	0	I
RAA600000000	REACTIVE MODIFIER QM-1007M	N/A	3	2	0	I
RAA700000000	PARALOID AU-1166	N/A	3	2	0	I
RAA800000000	JONCRYL 920 (SC JOHNSON)	N/A	3	2	0	I
RAB100000000	PARALOID AT-56 50%	N/A	3	2	0	I
RAB200000000	14894 AROLON 559-G4-70	N/A	2	2	0	X
RAC100000000	062-6260 SILICON ALKYD (NT 19)	N/A	2	2	0	X
RAC150000000	5742 ALKYD RESIN SOL. CARGILL	N/A	3	2	0	X
RAC200000000	214-1025 60% *5365 CARGILL	N/A	2	2	0	X
RAC310000000	214-1008 COPOLYMER VT ALKYD	N/A	3	2	0	X
RAC320000000	53-5359 CARGILL	N/A	3	2	0	X
RAC360000000	5396 RESIN (DO NOT BUY PER GA)	N/A	3	2	0	X
RAC400000000	3755-X-80 KELPOL	N/A	3	2	0	J
RAC500000000	QR-1225 ACRYLIC POLYMER RESIN	N/A	3	2	0	X
RAC550000000	XC-4011 RESIN		2	2	0	X
RAC580000000	KELSOL 3950-B2G-70	N/A	3	2	0	I
RAC700000000	REZIMAC HS 57-5747	MIXTURE	3	2	0	I
RAL100000000	10-010 (1316-50)SEE SU)	N/A	3	2	0	X
RAL110000000	10-071 (P-539-50) BECKOSOL	N/A	3	2	0	X
RAL125000000	13-055 STYRENTATED ALKYD*5367*	N/A	3	2	0	X
RAL140000000	10-074 BECKOSOL	N/A	2	1	0	X
RAM100000000	2477-X-65 ALKYD RESIN	N/A	3	1	0	G
RAM300000000	95929 3378-T CELLOKYD	N/A	3	2	0	I
RAM400000000	14676 1365-6X3-60 AROPLAZ	N/A	3	1	0	X
RAM500000000	11-630 DON/TBUY/GA SEE RAS415	N/A	3	2	0	X
RAM600000000	DURAMAC 57-816	n/a	3	2	0	I
RAM700000000	DURAMAC HS 57-5816	NA MIXTURE	2	2	0	I
RAS100000000	5290/7034/12-102(N16)CHAINSTOP	00457000-5019	3	2	0	X

RAS150000000	12-501 BECKOSOL HS(NOTE16)	N/A	3	2	0	I
RAS220000000	12-093 SHORT OIL ALKYD	N/A	3	2	0	X
RAS300000000	KELTROL 1074 14428	N/A	3	2	0	I
RAS400000000	52-5205/12-035	N/A	3	2	0	X
RAS415000000	402-50M RESIN(N19)	68015-33-8	2	2	0	X
RAS500000000	501-50XV(NT15/13A)	68915-10-6	3	2	0	X
RAS520000000	207-1631 ALKYD RESIN	68915-10-6	3	2	0	X
RAS550000000	95889 2315-S (NOTE 15)	N/A	2	2	0	G
RAS700000000	57-5731 ALKYD RESIN	N/A	3	2	0	X
RAS710000000	057-5707 ALKYD RESIN CARGILL	N/A	2	1	0	X
RAS800000000	93-111 BECKOSOL	N/A	3	2	0	J
RCB120000000	381-20 (20 SECOND)** CAB	9004-36-8	1	0	0	X
REC100000000	N-7 ETHYLCELLULOSE	9004-57-3	1	1	0	X
REC110000000	N-22 ETHYLCELLULOSE	9004-57-3	1	1	0	X
REP100000000	MIRASOL 601X REPLACE WITH REP5	N/A	3	1	1	X
REP200000000	UNIREZ 2415/815X70 POLYAMIDE	68410-23-1R	3	3	0	X
REP300000000	7321 *4011(WATER RED.) CARGILL	N/A	2	2	0	X
REP350000000	062-6247 EPOXY ESTER RESIN CAR	N/A	3	2	0	X
REP400000000	EPON RESIN 1001-B-80	N/A	3	2	0	I
REP470000000	EPON RESIN 834	N/A	1	2	0	X
REP500000000	EPOTUF 38-403 EPOXY ESTER SOL.	N/A	3	2	0	X
REP550000000	ARALDITE DY 023	2210-79-9	1	2	0	X
REP600000000	EPON RESIN 1001-CX-75	mixture	3	2	0	I
REP650000000	ARALDITE GY 6008	25068-38-6	1	2	0	X
REP700000000	DER 660 X 80 EPOXY RESIN	N/A	3	1	1	X
REP900000000	EPOTUF 37-143	N/A	1	2	1	X
RHE120000000	HY 283 HARDENER	N/A	0	1	0	X
RHE125000000	HY 943 HARDENER	N/A	1	3	0	X
RHE130000000	PKHH PHENOXY RESIN	25068-38-6	2	1	0	X
RME100000000	735 RESIMENE,CYMEL 380 *27-806	N/A	2	2	0	X
RME110000000	879**CONVERSION CHART	68002-21-1	3	2	0	
RME120000000	RESIMENE 730 (DO NOT BUY)(GA)	N/A	3	3	0	X
RME130000000	RESIMENE 755	68036-97-5	3	1	0	X
RME150000000	RESIMINE 2040 MODIFIED	N/A	3	0	0	X
RME300000000	CYMEL 303	N/A	1	1	0	X
RME400000000	23-2317 MELAMINE RESIN CARGILL	N/A	3	3	1	
RME500000000	CARGILL 23-2355 MELAMINE RESIN	N/A	1	3	1	X
RME600000000	BECKAMINE SUPER 27-580 *750 RE	N/A	2	2	1	X
RME700000000	CYMEL 325	N/A	3	2	0	I
RMO100000000	SPENKEL F19-50 MS	N/A	2	1	0	X
RMO110000000	7085M60*SPENKELF77M60(NOTE27)	N/A	2	1	0	X
RMO120000000	SPENKEL F78-50X	N/A	3	1	0	X
RMO125000000	SPENKEL F78-50T	N/A	3	1	0	G
RMO130000000	SPENSOL F96 MPW-32	PROPRIETARY	0	2	0	X
RMO250000000	SPENLITE M22-X-40	N/A MIXTURE	3	2	0	X
RMO300000000	10-015 BECKOSOL	N/A	3	1	0	X
RNA100000000	GILSONITE X-93 GILSONITE *178	N/A	3	2	0	H
RNC000000000	TRANSCO STRIPS	N/A	3	1	0	X
RNC010000000	RS-30-40 (E110) NITROCELLULOSE	9004-70-0	3	2	2	X
RNC120000000	NC/1/2 E35 (SNPE)	9004-70-0	3	2	2	X
RNC190000000	SS1/4 N/C RESIN (NOTE20)	9004-70-0	3	2	2	X
RNC290000000	N/C RS 1/4/ WOLFF E400	9004-70-0	3	2	0	X
RNC300000000	SPECIAL RS1/2 SEC.3.0-4.0	9004-70-0	3	2	2	X
RNC390000000	REGULAR RS1/2/WOLFF E560	9004-70-0	3	2	2	X
RNC400000000	RS 1/2 SECOND LINT SPECIAL/NC	9004-70-0	3	2	2	X
RNC590000000	N/C R5/WOLFF E840 (NOTE 23)	9004-70-0	3	2	2	X

RNC620000000	N/C RS20 CPS NITROCELLULOSE	9004-70-0	3	2	2	X
RNC650000000	N/C RS 18/25 NITROCELLULOSE	9004-70-0	3	2	2	I
RNC690000000	N/C RS15/E950 (NOTE 31)	9004-70-0	3	2	0	X
RNC700000000	N/C SS 40-60 SECOND	9004-70-0	3	2	2	X
RNC890000000	N/C R75 SEC/E1160 (NOTE31)	9004-70-0	3	2	2	X
RNC910000000	SPECIAL NC 3000 BLEND FOR ARMT	N/A	3	2	2	X
RNC990000000	N/C R1000 SEC (1000-1500)	9004-70-0	3	2	2	X
RPA100000000	72-7203 POLYESTER ACRYLIC RESI	N/A MIXTURE	3	2	0	X
RPE120000000	DESMODUR N-3200	N/A	1	2	1	X
RPE150000000	DESMODUR N-3390	N/A	2	1	1	X
RPE160000000	BAYHYDUR XP-7063	N/A	1	2*	1	I
RPE170000000	DESMODUR CB-60N	N/A	3	2	1	X
RPE180000000	DESMODUR N-3400	N/A	1	2	1	X
RPE200000000	DESMOPHEN 650A-65 PMA	N/A	2	1	0	X
RPE210000000	BAYHYDUR XP-7007	NA	1	2	1	X
RPE230000000	BAYHYDROL XP7110E		1	2	1	X
RPE250000000	DESMOPHEN 631A-75	N/A	2	1	0	X
RPE260000000	90065 6749-XA6-90 *57-5867	N/A	2	2	0	I
RPE270000000	POLYMAC 57-5784	N/A	3	2	0	X
RPE280000000	DESMOPHEN 670A-80	PROPRIETARY	2	1	0	X
RPE290000000	057-5761 POLYESTER RESIN SOLUT	N/A	3	2	0	X
RPE300000000	DIPENTAERYTHRITOL	126-58-9	1	2	1	X
RPE400000000	MULTRON R 221-75 PMA	N/A	2	1	1	X
RPE700000000	95891 CELLOKYD 7757-S	N/A	3	2	0	I
RPH100000000	BKS 2600	N/A	4	2	2	X
RPH200000000	VALTEX 2266 (US POLYMERS 7/29/	N/A	2	2	0	G
RPO100000000	CP-343-1 CHLORINATED POLYOLEFI	N/A	3	1	2	X
RRU650000000	VYES-4 UCAR SOLUTION VINYL	N/A	2	1	0	
RRU700000000	VAGH VINYL	N/A	0	0	0	X
RRU800000000	VINAC BEADS ASB-516	N/A	0	1	0	X
RRU910000000	VTAC-L PLIOLITE	60381-65-5	1	1	0	C
RSC150000000	213-1285(*6285)SILICONE ALKYD	N/A	3	2	0	H
RSC160000000	REZIMAC 6203 SILICONE ALKYD	N/A	3	2	0	H
RSC200000000	SR 882 (REPLACES SR 82)	N/A	3	1	0	X
RST100000000	CHEMPOL 013-1428 HS STYRENATED	N/A	3	2	0	X
RUDYRM-30000	TEST RAW MATERIAL	MIXTURE	3	2	0	I
RUG100000000	204-1434*31465-X(*1270 AROP	N/A	3	2	0	X
RUG110000000	AROPLAZ 528230 *1247-T-70	N/A	3	1	0	X
RUR100000000	BECKAMINE 21510 (*P138)	N/A	3	2	1	X
RUR200000000	19-1020*20-2053*U901*21500*F22	N/A	3	3	1	X
RVA100000000	CELLOKYD 8076-M-66	N/A	2	1	0	X
RVA120000000	EPS5922 *MAXVAR 2525 NO DRIERS	N/A	2	2	0	X
RVA200000000	MIL-V-16399 TYPE A MOISTURE PR	N/A	3	2	0	X
RVA300000000	WHITE 8# FRENCH VARNISH	N/A	3	2	0	X
RVA400000000	MIRASOL 12-A-3703	N/A MIXTURE	2	1	0	X
RVT100000000	POLYCHEM 7447-80	N/A MIXTURE	3	2	0	X
RWA100000000	CARGILL 54-7432 (W/R)	N/A	3	2	0	G
RWA200000000	KELSOL 3910-B2G-75**NO MANG.DR	N/A	2	2	0	X
RWA300000000	KELSOL 3960-B2G-75	N/A	3	2	0	X
RWA400000000	KELSOL 3961-B2G-75	N/A	2	2	0	H
RWA450000000	KELSOL 3990-B2G-70	N/A	3	2	0	I
RWA600000000	KELSOL 3980-G4-75	NA	2	2	0	I
RWE200000000	RHOPLEX WL-96	N/A	0	1	0	X
RWE380000000	RHOPLEX SG-10M	N/A MIXTURE	0	1	0	X
RWE450000000	RHOPLEX AC-3001 EMULSION	N/A	2	2	0	G
RWE460000000	NEOCRYL A 639	N/A	1	1	0	I
RWE470000000	NEOCRYL A-604	N/A	2	2	0	G

RWE490000000	NEOCRYL XA-6099	7664-41-7	1	1	0	X
RWE550000000	PLIOTEC 7103 GOODYEAR /YOUNG	N/A	0	1	0	X
RWE600000000	AQUALON CTG D-857	N/A	0	1	1	X
RWE700000000	EPOTUF 38-692	N/A	2	2	1	X
RWE900000000	E1018 EMULSION 48%	N/A	0	1	0	X
RWR100000000	MIROSOL 815-0202	N/A	3	2	0	X
RWR200000000	MIRAVAR V-1027	N/A	3	2	0	X
S-A700000000	AERON A-70 PROPELLANT	68476-86-8	4	2	0	X
S-ACE0000000	ACETONE	67-64-1	3	1	0	I
S-AMA0000000	AMYL ALCOHOL	N/A	3	2	0	X
S-BAC0000000	BUTYL ACETATE 98%	123-86-4	3	2	0	X
S-BUTALC0000	N-BUTYL ALCOHOL (BUTANOL)	71-36-3	3	2	0	X
S-BUTCARBIT0	BUTYL CARBITOL - DB	112-34-5	1	2	0	X
S-BUTCE00000	BUTYL CELLOSOLVE - EB	111-76-2	2	2	0	X
S-BUTCEACE00	BUTYL CELLOSOLVE ACETATE	112-07-2	1	2	0	X
S-CAR0000000	DE - CARBITOL	111-90-0	1	2	0	X
S-CYC0000000	CYCLOHEXANONE	108-94-1	2	1	0	X
S-DIA0000000	DIACETONE ALCOHOL	123-42-2	2	2	0	X
S-DIBK000000	DIBK	108-83-8	3	2	1	X
S-ETHAC00000	ETHYL ACETATE 99%	141-78-6	4	1	0	X
S-ETHDI00000	ETHYLENE DICHLORIDE	107-06-2	4	3	0	X
S-ETHER00000	ETHER	60-29-7	4	2	2	
S-EX60000000	EXXATE 600 SOLVENT	88230-35-7	2	2	0	X
S-FIL0000000	ETHYL ALCOHOL C-200	64-17-5	3	3	0	X
S-HEX0000000	HEXANE	110-54-3	3	2	0	X
S-IBIB000000	ISOBUTYL ISOBUTYRATE	97-85-8	2	1	0	X
S-ISOACE0000	ISOPROPYL ACETATE (UN-1220)	108-21-4	3	1	0	X
S-ISOAL00000	ISOPROPYL ALCOHOL,99% ANHYDRO	67-63-0	3	2	0	X
S-ISPARF0000	COMPASS FLUID	68551-17-7	2	2	0	I
S-KER0000000	KEROSENE	8008-20-6	2	1	0	X
S-LAK0000000	LAKTANE	N/A	3	1	0	X
S-MAK0000000	MAK - METHYL n-AMYL KETONE	110-43-0	2	1	0	
S-MCA0000000	METHYL CELLOSOLVE ACETATE	108-65-6	2	1	0	X
S-MEK0000000	MEK - METHYL ETHYL KETONE	78-93-3	3	2	0	G
S-MET0000000	METHANOL	67-56-1	3	1	0	X
S-METAC00000	METHYL ACETATE		1	2	0	X
S-METCE00000	GLYCOL ETHER EM *METHYL CELLOS	109-86-4	2	3	1	X
S-MIAK000000	MIAK * METHYL ISOAMYL KETONE	110-12-3	3	3	0	X
S-MIBK000000	MIBK * METHYL ISOBUTYL KETONE	108-10-1	3	2	0	X
S-MNPK000000	METHYL N-PROPYL KETONE	107-87-9	3	2	0	H
S-OMS0000000	ODORLESS MINERALSPIRITS UN1268	64741-65-7	2	2	0	X
S-PEN0000000	2.4 PENTANEDIONE	123-54-6	2	2	0	X
S-PGPE000000	PROPYLENE GLYCOL PROPYL ETHER		3	2	0	I
S-PM00000000	PM SOLVENT (URETHANE) UN1171	107-98-2	3	2	0	X
S-PMAC000000	PM ACETATE UN#3092	108-65-6	2	1	0	X
S-PTB0000000	ARCOSOLV PTB (UN 1993)	57018-52-7	2	2	0	B
S-RS00000000	RECOVERED SOLVENT	N/A	3	1	0	
S-SOL1000000	SOLVESSO 100 (AROMATIC 100)	64742-95-6	2	1	0	X
S-SOL1400000	SOLVENT 140 HT	64742-88-7	2	2	0	X
S-SOL1500000	SOLVESSO 150 (AROMATIC 150)	64742-95-4	2	2	0	X
S-SS30000000	SURE-SOL-300	MIXTURE	2	2	0	I
S-TOL0000000	TOLUENE	108-88-3	3	2	0	X
S-TURP000000	GUM SPIRITS OF TURPENTINE	8006-64-2	3	1	0	X
S-VAR0000000	MINERAL SPIRITS RULE 66 *VARSO	8052-41-3	2	1	0	X
S-VMP0000000	VM & P NAPHTHA	64742-89-8	3	1	0	X
S-XYL0000000	XYLENES	1330-20-7	3	2	0	H
X-ANTORBOND0	ANTORBOND PRIMER	N/A	3	2	0	X

10) Following is a description of the storage for all raw materials used, stored, or handled at the site with concomitant descriptions of the containment areas and procedures for loading and unloading of materials. The volume of the substances used varies dramatically based on need and period of time for which you desire amounts reported (no period of time stated in your request); therefore, it is impossible to provide volumes for the substances.

Above Ground Storage Tanks (ASTS)
Two Tank Farms
Three Single ASTS

Tank Truck Loading/Unloading
DEP Approved

In-Facility Piping
Above Ground Piping

Process Areas
Batch Process

ABOVE GROUND STORAGE TANKS (ASTS)

SOUTH TANK FARM

DESCRIPTION OF STORAGE

The South Tank Farm containment system (diked area) contains 12 tanks which are used to store DPCC regulated substances.

T-21 has been taken out of service, cleaned and the pipes removed and capped.

T-22 and T-23 have been taken out of service, cleaned and the pipes removed and capped.

T-24 contains Acetone. T-24 has no internal heating coils (per N.J.A.C. 7:1E-2.2(c)). It has a pipe which enters the tank below the liquid level (per N.J.A.C. 7:1E-2.2(a)3)and is equipped with a readily accessible shut off valve at the base of the tank to prevent the contents of the tank from escaping outside the secondary containment area in the event of a pipe rupture outside of the containment area. There is an overflow line on the top of the tank directed into the containment area.

T-25 contains butyl acetate. T-25 has no internal heating coils (per N.J.A.C. 7:1E-2.2(c)). It has a pipe which enters the tank below the liquid level (per N.J.A.C. 7:1E-2.2(a)3)and is equipped with a readily accessible shut off valve at the base of the tank to prevent the contents of the tank from escaping outside the secondary containment area in the event of a pipe rupture outside of the containment area. There is an overflow line on the top of the tank directed into the containment area.

T-26 contains ethyl acetate. T-26 has no internal heating coils (per N.J.A.C. 7:1E-2.2(c)). It has a

pipe which enters the tank below the liquid level (per N.J.A.C. 7:1E-2.2(a)3)and is equipped with a readily accessible shut off valve at the base of the tank to prevent the contents of the tank from escaping outside the secondary containment area in the event of a pipe rupture outside of the containment area. There is an overflow line on the top of the tank directed into the containment area.

T-27 contains standard thinner, a mixture of several solvents. T-27 has no internal heating coils (per N.J.A.C. 7:1E-2.2(c)). It has a pipe which enters the tank below the liquid level (per N.J.A.C. 7:1E-2.2(a)3)and is equipped with a readily accessible shut off valve at the base of the tank and an additional shut off valve behind the pump station which is inside of the containment area to prevent the contents of the tank from escaping outside the secondary containment area in the event of a pipe rupture outside of the containment area. There is an overflow line on the top of the tank directed into the containment area.

T-28 contains methyl ethyl ketone. T-28 has no internal heating coils (per N.J.A.C. 7:1E-2.2(c)). It has a pipe which enters the tank below the liquid level (per N.J.A.C. 7:1E-2.2(a)3)and is equipped with a readily accessible shut off valve at the base of the tank and an additional shut off valve in the pump station which is inside of the containment area to prevent the contents of the tank from escaping outside the secondary containment area in the event of a pipe rupture outside of the containment area. There is an overflow line on the top of the tank directed into the containment area.

T-29 contains isopropyl alcohol. T-29 has no internal heating coils (per N.J.A.C. 7:1E-2.2(c)). It has a pipe which enters the tank below the liquid level (per N.J.A.C. 7:1E-2.2(a)3)and is equipped with a readily accessible shut off valve at the base of the tank to prevent the contents of the tank from escaping outside the secondary containment area in the event of a pipe rupture outside of the containment area. There is an overflow line on the top of the tank directed into the containment area.

T-30 contains xylene. T-30 has no internal heating coils (per N.J.A.C. 7:1E-2.2(c)). It has a pipe which enters the tank below the liquid level (per N.J.A.C. 7:1E-2.2(a)3)and is equipped with a readily accessible shut off valve at the base of the tank and an additional shut off valve in the pump station which is inside of the containment area to prevent the contents of the tank from escaping outside the secondary containment area in the event of a pipe rupture outside of the containment area. There is an overflow line on the top of the tank directed into the containment area.

T-33 is a 4 compartment tank.

Both end compartments are empty.

The one center compartment contains Laktane

The other contains Butyl Cellosolve.

Each compartment has no internal heating coils (per N.J.A.C. 7:1E-2.2(c)). Each has a pipe which enters the tank below the liquid level (per N.J.A.C. 7:1E-2.2(a)3)and is equipped with a readily accessible shut off valve at the base of the tank with an attached string to provide easy access to prevent the contents of the tank from escaping outside the secondary containment area in the event of a pipe rupture outside of the containment area. There is an overflow line on the top of the tank directed into the containment area.

T-35 is a 4 compartment tank. One end compartment is empty. One center compartment contains butyl alcohol. The other contains a solvent mixture. The other end compartment contains Hexane.

Each of the compartments has no internal heating coils (per N.J.A.C. 7:1E-2.2(c)). Each has a pipe which enters the tank below the liquid level (per N.J.A.C. 7:1E-2.2(a)3)and is equipped with a readily accessible shut off valve at the base of the tank with an attached string to provide easy access to prevent the contents of the tank from escaping outside the secondary containment area in the event of a pipe rupture outside of the containment area. There is an overflow line on the top of the tank directed into the containment area.

CONTAINMENT

This tank farm (see Figure 2.0) is surrounded by a three-foot high, 3000 psi reinforced concrete containment dike. The containment area is 14255.718 cubic feet capable of holding 106,632.77 gallons of liquid. Containment dike construction details include a six-inch thick sidewall and one-foot thick concrete floor. There is an additional eight-inch thick base under each AST. The interior of the dike is unlined; however, it is structurally sound and the concrete floor and sidewalls of the containment structure are impermeable to passage or chemical attack by the stored substances under prevailing storage conditions and will:

1) protect ground water for sufficient time needed to cleanup and remove a leak up to the entire volume of the largest tank using the system;
2) allow the visual detection of leaks; and
3) be visually inspected daily.

There are no pipe penetrations of the containment dike.

SHUT OFF VALVES

Outflow shut off valves for AST's are located inside the secondary containment (dike) area. Outflow shut off valves are readily accessible for these tanks and are located within main building. Electrical disconnects for outflow pumps from all AST's in the tank farm are located in the pump sheds.

TANK FILLING

Tank filling from delivery trucks is closely monitored throughout the filling process (per N.J.A.C. 7:1E-2.2(d)). Two men are posted by the fill/pump station. One on the tank for visual inspection. The tank is measured prior to the filling process to determine that there is sufficient capacity not to exceed 90% of the capacity of the tank. Two (2) operators are present during all transfer procedures. Although all transfer is in the line of sight transceivers are used so that communication between the operators is clear. These transceivers are also used from internal locations of the building and other locations on the property when deemed necessary for safety or other considerations. The transmitter has a range of up to several miles and the property is only a few hundred feet long.

High Level Alarms

High liquid level alarms (per N.J.A.C. 7:1E-2.2(d) and (e))) are capable of detecting storage tank (AST) over filling. High liquid level pump cut off systems have been added to the tank gauges.

Secondary means of overflow prevention is by means of visual inspection and/or communication system. In order to comply with the communication option two (2) VHF FM Business Band Transceiver for hand held communication were purchased. They have frequency coverage of 151.250 to 156.255 Mhz. We use band 154.600 Mhz. Two (2) operators are present during all transfer procedures. Although all transfer is in the line of sight the transceivers are used so that communication between the operators is clear. The transmitter has a range of up to several miles and the property is only a few hundred feet long.

NORTH TANK FARM

The north tank farm has 10 tanks which are used to store DPCC regulated substances.

T-11 contains #2 Fuel Oil. T-11 has no internal heating coils (per N.J.A.C. 7:1E-2.2(c)). It has pipe which enter the tank below the liquid level and it is equipped with a readily accessible shut off valve at the base of the tank to prevent the contents of the tank from escaping outside the secondary containment area in the event of a pipe rupture outside of the containment area. There is an overflow line on the top of the tank directed into the containment area.

T-12 contains #2 Fuel Oil. T-12 has no internal heating coils (per N.J.A.C. 7:1E-2.2(c)). It has pipe which enter the tank below the liquid level and it is equipped with a readily accessible shut off valve at the base of the tank to prevent the contents of the tank from escaping outside the secondary containment area in the event of a pipe rupture outside of the containment area. There is an overflow line on the top of the tank directed into the containment area.

T-13 contains Butyl Acetate. T-13 has no internal heating coils (per N.J.A.C. 7:1E-2.2(c)). It has a pipe which enters the tank below the liquid level and is equipped with a readily accessible shut off valve at the base of the tank to prevent the contents of the tank from escaping outside the secondary containment area in the event of a pipe rupture outside of the containment area. There is an overflow line on the top of the tank directed into the containment area.

T-14 contains Laktane. T-14 has no internal heating coils (per N.J.A.C. 7:1E-2.2(c)). It has a pipe which enters the tank below the liquid level and is equipped with a readily accessible shut off valve at the base of the tank to prevent the contents of the tank from escaping outside the secondary containment area in the event of a pipe rupture outside of the containment area. There is an overflow line on the top of the tank directed into the containment area.

T-15 contains TyII Epoxy Thinner. T-15 has no internal heating coils (per N.J.A.C. 7:1E-2.2(c)). It has a pipe which enters the tank below the liquid level and is equipped with a readily accessible shut off valve at the base of the tank to prevent the contents of the tank from escaping outside the secondary containment area in the event of a pipe rupture outside of the containment area. There is an overflow line on the top of the tank directed into the containment area.

T-16 contains Butyl Alcohol. T-16 has no internal heating coils (per N.J.A.C. 7:1E-2.2(c)). It has a pipe which enters the tank below the liquid level and is equipped with a readily accessible shut off valve at the base of the tank to prevent the contents of the tank from escaping outside the secondary containment area in the event of a pipe rupture outside of the containment area. There is an overflow line on the top of the tank directed into the

containment area.

T-17A contains Methoxy Propanol (PM Solvent). T-17A has no internal heating coils (per N.J.A.C. 7:1E-2.2(c)). It has a pipe which enters the tank below the liquid level and is equipped with a readily accessible shut off valve at the base of the tank to prevent the contents of the tank from escaping outside the secondary containment area in the event of a pipe rupture outside of the containment area. There is an overflow line on the top of the tank directed into the containment area.

T-17 contains Toluene. T-17 has no internal heating coils (per N.J.A.C. 7:1E-2.2(c)). It has a pipe which enters the tank below the liquid level and is equipped with a readily accessible shut off valve at the base of the tank to prevent the contents of the tank from escaping outside the secondary containment area in the event of a pipe rupture outside of the containment area. There is an overflow line on the top of the tank directed into the containment area.
T-20 contains Ethyl Alcohol. T-20 has no internal heating coils (per N.J.A.C. 7:1E-2.2(c)). It has a pipe which enters the tank below the liquid level and is equipped with a readily accessible shut off valve at the base of the tank to prevent the contents of the tank from escaping outside the secondary containment area in the event of a pipe rupture outside of the containment area. There is an overflow line on the top of the tank directed into the containment area.

T-31 is a 4 compartment tank. The end compartments both contain mineral spirits. One of the center compartments contains VM&P. The other center compartment contains Naptha.

There are no pipes below the liquid level on this tank. There is an overflow line on the top of the tank directed into the containment area.

CONTAINMENT

The North Tank Farm (Figure 2) is bounded on five sides by the main building. It is bounded on the north side by a double-walled containment dike. The containment dike is comprised of two, three-foot high, six-inch thick walls on a one-foot thick concrete floor. The ASTs are placed on eight-inch thick concrete bases. The interior of the dike is unlined; however, it is structurally sound and the concrete floor and sidewalls of the containment structure are impermeable to passage or chemical attack by the stored substances under prevailing storage conditions and will:

1) protect ground water for sufficient time needed to cleanup and remove a leak up to the entire volume of the largest tank using the system;
2) allow the visual detection of leaks; and
3) be visually inspected daily.

SHUT OFF VALVES

Outflow shut-off valves of the ASTs are located outside of the secondary containment area. Outflow shut-off valves for these tanks are located within the main building. Electrical disconnects for the outflow pumps from all ASTs in the tank farm are located in the main building.

TANK FILLING

Tank filling from delivery trucks is closely monitored throughout the filling process (per N.J.A.C. 7:1E-2.2(d)). Two men are posted by the fill/pump station. One on the tank for visual inspection. The tank is measured prior

to the filling process to determine that there is sufficient capacity not to exceed 90% of the capacity of the tank. Two (2) operators are present during all transfer procedures. The transceivers are used so that communication between the operators is clear. The transmitter has a range of up to several miles and the property is only a few hundred feet long.

High Level Alarms

High liquid level alarms (per N.J.A.C. 7:1E-2.2(d) and (e))) are capable of detecting storage tank (AST) over filling. High liquid level pump cut off systems have been added to the tank gauges.

Secondary means of overflow prevention is by means of visual inspection and/or communication system. In order to comply with the communication option two (2) VHF FM Business Band Transceiver for hand held communication were purchased. They have frequency coverage of 151.250 to 156.255 Mhz. We use band 154.600 Mhz. Two (2) operators are present during all transfer procedures. The transceivers are used so that the men at the pump station can communicate with the man at the tank in a clear manner. The transmitter has a range of up to several miles and the property is only a few hundred feet long.

SINGLE TANKS T-32, T-34, T-10 and Portable Hazardous Waste Tanks

Tank T-32 in AST location 2 (Figure 2)is a 10,000 gallon horizontal tank which contains four compartments.

One compartment contains acetone. The second compartment contains methanol. The third compartment contains polyvinyl acetate. The fourth compartment contains diacetone alcohol.

In T-32 none of the compartment have internal heating coils (per N.J.A.C. 7:1E-2.2(c)). There are pipes which enter the tank below the liquid level in each compartment and each is equipped with a readily accessible shut off valve at the base of the tank with an attached string to provide easy access to prevent the contents of the tank from escaping outside the secondary containment area in the event of a pipe rupture outside of the containment area. There is an overflow line on the top of the tank directed into the containment area.

Tank T-34 in AST location 1 (Figure 2)is a 10,000 gallon horizontal tank which contains four compartments.

The first compartment contains 60% maleic solution, an intermediate, made in house and used in formulations. The second contains 9652, a clear semigloss lacquer made in house. The third contains 9600 a clear gloss lacquer made in house. The fourth compartment contains dioctyl phthalate, a plasticiser.

In T-34 none of the compartments have internal heating coils (per N.J.A.C. 7:1E-2.2(c)). Each has a pipe which enters the tank below the liquid level and each is equipped with a readily accessible shut off valve at the base of the tank with an attached string to provide easy access to prevent the contents of the tank from escaping outside the secondary containment area in the event of a pipe rupture outside of the containment area. There is an overflow line on the top of each of the tanks compartments directed into the containment area.

Tank 10 in AST location Area 9 on the North side of the building is a 15,000 gallon horizontal tank containing 6 compartments of 2,500 gallons each. These compartments contain the following resin solutions.

The eastern most compartment toward the rear of the property contains RAS5 Alkyd Resin solution, the next

compartment contains RAS1 Alkyd Resin solution, the center 2 compartments are empty, the fifth compartment contains RAC3 Alkyd Resin solution. The western most compartment toward the front of the building contains RAS415 Alkyd Resin solution.

Each compartment has no internal heating coils (per N.J.A.C. 7:1E-2.2(c)). Each has a pipe which enters the tank below the liquid level and compartments 1,2,4,5, and 6 are equipped with a readily accessible shut off valves at the base of the tank to provide easy access to prevent the contents of the tank from escaping outside the secondary containment area in the event of a pipe rupture outside of the containment area. Compartment 3 is empty and has been out of service since the 1998. This compartment does not have a shut off valve at the bottom. If ever put back into service a shut off valve will be installed prior to putting the compartment into service. There is an overflow line on the top of each compartment directed into the containment area.

CONTAINMENT

The tank is surrounded by a 4.5 foot high, 3,000 psi reinforced concrete containment dike. The containment dike details include a six-inch thick sidewall and a one-foot thick concrete floor. In addition, an eight-inch thick concrete base underlies each AST. The interior of each AST is unlined. The concrete floors and sidewalls of the containment structures are structurally sound and impermeable to passage or chemical attack by the stored substances under prevailing storage conditions and will:

1) protect ground water for sufficient time needed to cleanup and remove a leak up to the entire volume of the largest tank using the system;
2) allow the visual detection of leaks; and
3) are visually inspected daily.

There are no pipe penetrations of the containment dike.

SHUT OFF VALVES

Outflow valves for the ASTS are located outside of the secondary containment (dike) area. - Outflow shut off valves are located within the main building. Electrical disconnects for the outflow pumps the ASTS are located in the main building.

TANK FILLING

Tank filling from delivery trucks is closely monitored throughout the filling process (per N.J.A.C. 7:1E-2.2(d)). Two men are posted by the fill/pump station. One on the tank for visual inspection. The tank is measured prior to the filling process to determine that there is sufficient capacity not to exceed 90% of the capacity of the tank.

Two (2) operators are present during all transfer procedures. Although all transfer is in the line of sight the transceivers are used so that communication between the operators is clear. The transmitter has a range of up to several miles and the property is only a few hundred feet long.

High Level Alarms

Tanks 32, 34, and 10 have had high liquid level alarms (per N.J.A.C. 7:1E-2.2(d) and (e))) installed which are capable of detecting storage tank (AST) over filling. High liquid level pump cut off systems have been added to the tank gauges.

Secondary means of overflow prevention is by means of visual inspection and/or communication system. In order to comply with the communication option two (2) VHF FM Business Band Transceiver for hand held communication were purchased. They have frequency coverage of 151.250 to 156.255 Mhz. We use band 154.600 Mhz. Two (2) operators are present during all transfer procedures. The transceivers are used so that communication between the operators is clear. The transmitter has a range of up to several miles and the property is only a few hundred feet long.

Portable Hazardous Waste Tanks

The portable shipping tanks are used in the processing area are in accordance with NFPA 30, *Flammable and Combustible Liquids Code,* and the construction complies with NFPA 386, *Portable Shipping Tanks.* These tanks are used for the removal of waste material. After being filled in the process area they are removed to the rear drum storage area. The are owned by Marisol 125 Factory Lane Middlesex, NJ 08846 732 469-5100.

DRUM STORAGE AREAS

There are three drum storage areas located outside of the building. All of these areas paved with concrete and diked. They are open and not covered by a roof.

A) DRUM STORAGE AREA 1

DESCRIPTION and CONTAINMENT

Drum storage Area 1 (per N.J.A.C. 7:1E-4.2(d)1) is bounded on the north by the building and on the east and west by the concrete dikes for tanks 32 and 34 the south side is contained within a 6" dike. The materials stored in this area are all resins used in the formulations. The chemicals stored here change on a daily basis depending on the materials needed in the factory at the time.

Container	Volume in gallons	Total volume gallons	Type	Largest volume gal.	Volume of 6" rain gal.	Total Storage excess capacity in gallons	Containment material
Drums	55	1326.4284	D	220	24	1082.4284	Concrete

Any of the following chemicals may be stored in this area.

RAWCODE	CNAME	CAS
RAA050000000	ACRYLIC RESIN	N/A
RAA05SOL0000	ACRYLIC RESIN	N/A
RAA060000000	CARBOXY ACRYLIC BAKING RESIN	N/A
RAA100000000	ACRYLIC RESIN	N/A
RAA10SOL0000	ACRYLIC RESIN	N/A
RAA110000000	ACRYLIC RESIN	N/A
RAA120000000	ACRYLIC RESIN	N/A

RAWCODE	CNAME	CAS
RAA125000000	ACRYLIC RESIN	N/A
RAA127000000	ACRYLIC RESIN	N/A
RAA130000000	ACRYLIC RESIN	N/A
RAA13SOL0000	ACRYLIC RESIN	N/A
RAA140000000	ACRYLIC RESIN	N/A
RAA14SOL0000	ACRYLIC RESIN	N/A
RAA150000000	ACRYLIC RESIN	N/A
RAA15SOL0000	ACRYLIC RESIN	N/A
RAA160000000	ACRYLIC RESIN	N/A
RAA170000000	ACRYLIC RESIN	N/A
RAA180000000	ACRYLIC RESIN	N/A
RAA200000000	ACRYLIC RESIN	N/A
RAA210000000	ACRYLIC RESIN	N/A
RAA300000000	SYNTHETIC RESIN	N/A
RAA350000000	ACRYLIC MODIFIED ALKYD	N/A
RAA400000000	ACRYLIC RESIN	N/A
RAA500000000	ACRYLIC RESIN SOLUTION	N/A
RAA600000000	SUBSTITUTED DIESTER/ALCOHOL	N/A
RAA700000000	ACRYLIC RESIN SOLUTION	N/A
RAA800000000	ACRYLIC RESIN SOLUTION	N/A
RAB100000000	ACRYLIC RESIN	N/A
RAB200000000	ACRYLIC RESIN	N/A
RAC100000000	ALKYD RESIN	N/A
RAC150000000	ALKYD RESIN	N/A
RAC200000000	ALKYD RESIN	N/A
RAC300000000	RESIN SOLUTION	68855-93-6
RAC320000000	RESIN SOLUTION	N/A
RAC360000000	RESIN SOLUTION	N/A
RAC400000000	ALKYD RESIN	N/A
RAC500000000	ACRYLIC POLYMER RESIN	N/A
RAC580000000	ALKYD RESIN SOLUTION	N/A
RAC600000000	AQUEOUS POLYMER EMULSION	N/A
RAC700000000	COPOLYMER ALKD	MIXTURE
RAL100000000	ALKYD RESIN	N/A
RAL110000000	SYNTHETIC RESIN	N/A
RAL120000000	ALKYD RESIN	67922-85-4

RAWCODE	CNAME	CAS
RAL125000000	ALKYD RESIN	N/A
RAL140000000	ALKYD RESIN	N/A
RAL150000000	ALKYD RESIN	66071-86-1
RAL200000000	ALKYD RESIN	N/A
RAL220000000	ALKYD RESIN	N/A
RAL230000000	ALKYD RESIN	N/A
RAM100000000	ALKYD RESIN	N/A
RAM200000000	ALKYD RESIN	N/A
RAM300000000	ALKYD RESIN	N/A
RAM400000000	ALKYD RESIN	N/A
RAM600000000	MEDIUM OIL ALKYD	n/a
RAS100000000	ALKYD RESIN	00457000-5019
RAS150000000	CHAIN STOPPED ALKYD RESIN	N/A
RAS200000000	ALKYD RESIN	N/A MIXUTRE
RAS220000000	ALKYD RESIN	N/A
RAS250000000	ALKYD RESIN	N/A
RAS300000000	VT OIL ER	N/A
RAS400000000	ALKYD RESIN	N/A
RAS415000000	ALKYD RESIN	68015-33-8
RAS415SOL000	ALKYD RESIN	N/A
RAS500000000	ALKYD RESIN	68915-10-6
RAS550000000	POLYESTER RESIN	N/A
RAS600000000	ALKYD RESIN	N/A
RAS700000000	ALKYD RESIN	N/A
RAS710000000	ALKYD RESIN	N/A
RAS800000000	ALKYD RESIN	N/A
RAS900000000	RESIN	N/A
RCA100000000	CELLULOSE RESIN	9004-35-7
RCA200000000	CELLULOSE RESIN	9004-35-7
RCA300000000	CELLULOSE RESIN	9004-35-7
RCB100000000	CELLULOSE ACETATE BUTRYATE POLYMER	9004-36-8
RCB110000000	CELLULOSE ACETATE BUTRYATE POLYMER	9004-36-8
RCB120000000	CELLULOSE ACETATE BUTRYATE POLYMER	9004-36-8
RCB130000000	CELLULOSE ACETATE BUTRYATE POLYMER	9004-36-8
RCB140000000	CELLULOSE ACETATE	N/A
RCB150000000	CELLULOSE ACETATE PROPIANATE	N/A

RAWCODE	CNAME	CAS
REC100000000	ETHYLCELLULOSE	9004-57-3
REC110000000	ETHYLCELLULOSE	9004-57-3
REP100000000	EPOXY ESTER COPOLYMER	N/A
REP200000000	POLYAMIDE RESIN SOLUTION IN XYLENE	68410-23-1R
REP300000000	EPOXYESTER COPOLYMER RESIN SOLUTION	N/A
REP350000000	EPOXY ESTER RESIN	N/A
REP400000000	EPOXY RESIN SOLUTION	N/A
REP420000000	EPOXY RESIN SOLUTION	
REP450000000	EPOXY RESIN SOLUTION	N/A
REP470000000	EPOXY RESIN	N/A
REP500000000	EPOXY ESTER RESIN SOLUTION	N/A
REP550000000	OXIRANE (2-METHYLPHENOXY)METHYL	2210-79-9
REP570000000	RESIN POLYMER	79185-77-6
REP600000000	EPOXY RESIN SOLUTION	mixture
REP650000000	PHENOL,4,4'-(1-METHYLETHYLIDINE)BIS-	25068-38-6
REP700000000	EPOXY RESIN	N/A
REP800000000	MODIFIED LIQUID EPOXY RESIN	26447-14-3
REP900000000	EPOXY RESIN DISPERSION	N/A
RHE100000000	BISPHENOL A EPOXY RESIN	67924-34-9
RHE110000000	BISPHENOL A EPOXY RESIN	67924-34-9
RHE120000000	POLYMERIC FATTY ACID AMIDE	N/A
RHE130000000	PHENOXY RESIN	25068-38-6
RHH100000000	POLYMERIZED AROMATIC MONOMER	N/A
RHH200000000	STYRENE POLYMER	
RHH500000000	POLMERIZED AROMATIC HYDROCARBON	N/A
RHM100000000	MALEIC RESIN	68038-41-5
RHM200000000	MODIFIED RESIN ESTER	PROPRIETARY
RHM300000000	MALEIC RESIN	
RHM400000000	MODIFIED RESIN ESTER	PROPRIETARY
RHP100000000	SYNTHETIC RESIN	N/A
RHP200000000	SEYNTHETIC RESIN	N/A
RHP300000000	COPAL GUM	N/A
RHP400000000	STYRENE=ALLYL ALCOHOL COPOLYMER	25119-62-4
RKO100000000	ACRYLIC RESIN	N/A
RME100000000	MELAMINE RESIN SOLUTION N	N/A
RME110000000	MELAMINE FORMALDEHYDE RESIN SOLUTION	68002-21-1

RAWCODE	CNAME	CAS
RME120000000	METHYLATED MELAMINE-FORMALDEHYDE	N/A
RME130000000	METH.,BUTY.MELAMINE-FORMALDEHYDE RESIN	68036-97-5
RME150000000	STYRENE-ALLYL ALCOHOL MODIFIED MMF RESIN	N/A
RME200000000	MELAMINE	108-78-1
RME300000000	METHOXY MELAMINE RESIN	N/A
RME350000000	MELAMINE RESIN SOLUTION	N/A
RME400000000	MELAMINE RESIN	N/A
RME500000000	MELAMINE RESIN	N/A
RME600000000	MELAMINE-FORMALDEHYDE RESIN SOL.	N/A
RME700000000	MELAMINE FORMALDEHYDE RESIN	N/A
RME750000000	HMMM RESIN	
RME800000000	METHYLATED MELAMINE RESIN	N/A
RMO100000000	OIL MODIFIED POLYURETANE RESIN SOLUTION	N/A
RMO110000000	OIL MODIFIED POLYURETANE RESIN SOLUTION	N/A
RMO120000000	OIL MODIFIED POLYURETHANE RESIN SOLUTION	N/A
RMO125000000	POLYURETHANE RESIN SOLUTION	N/A
RMO130000000	POLYURETHANE DISPERSION	PROPRIETARY
RMO140000000	OIL MODIFIED URETHANE DISPERSION	N/A
RMO200000000	URETHANE CURING AGENT	N/A
RMO250000000	ALIPHATIC MOISTURE CURE URETHANE	N/A MIXTURE
RMO300000000	SYNTHETIC RESIN	N/A
RNA100000000	ASPHALT SOLUTION	N/A
RNA200000000	DAMAR	90-16-2
RNC000000000	NITROCELLULOSE	N/A
RNC010000000	NITROCELLULOSE	9004-70-0
RNC100000000	NITROCELLULOSE	9004-70-0
RNC190000000	NITROCELLULOSE	9004-70-0
RNC200000000	NITROCELLULOSE	9004-70-0
RNC290000000	NITROCELLULOSE	9004-70-0
RNC300000000	CELLULOSE NITRATE	9004-70-0
RNC390000000	NITROCELLULOSE	9004-70-0
RNC400000000	N/C RESIN	9004-70-0
RNC500000000	N/C RESIN	9004-70-0
RNC590000000	NITROCELLULOSE	9004-70-0
RNC600000000	N/C RESIN	9004-70-0
RNC620000000	N/C RESIN	9004-70-0

RAWCODE	CNAME	CAS
RNC650000000	N/C RESIN	9004-70-0
RNC690000000	NITROCELLULOSE	9004-70-0
RNC700000000	N/C RESIN	9004-70-0
RNC800000000	N/C RESIN	9004-70-0
RNC890000000	NITROCELLULOSE	9004-70-0
RNC900000000	N/C RESIN	9004-70-0
RNC910000000	NITROCELLULOSE	N/A
RNC990000000	N/C RESIN	9004-70-0
RPA100000000	POLYESTER RESIN SOLUTION	N/A MIXTURE
RPE100000000	ALIPHATIC POLYISOCYANATE SOLUTION	N/A
RPE120000000	HEXAMETHYLENE DIISOCYANATE POLYMER ISOCY	N/A
RPE150000000	ALIPHATIC POLYISOCYANATE SOLUTION	N/A
RPE160000000	ALIPHATIC POLYISOCYANATE	N/A
RPE170000000	TOLUENE DIISOCYANATE BASED ADDUCT	N/A
RPE180000000	HEXAMETHYLENE DIISOCYANATE POLYMER	N/A
RPE200000000	POLYESTER POLYOL SOLUTION	N/A
RPE220000000	POLYESTER RESIN DISPERSION	N/A
RPE250000000	POLYESTER POLYOL	N/A
RPE260000000	HI SOLIDS POLYESTER RESIN	N/A
RPE270000000	POLYESTER RESIN SOLUTION	N/A
RPE280000000	POLYESTER POLYOL	PROPRIETARY
RPE290000000	POLYESTER RESIN SOLUTION	N/A
RPE300000000	DIPENTAERYTHRITOL	126-58-9
RPE400000000	SATURATED POLYESTER RESIN SOL.	N/A
RPE600000000	POLYESTER RESIN	N/A
RPE700000000	POLYESTER RESIN SOLUTION	N/A
RPH100000000	PHENOL FORMALDEHYDE RESIN	N/A
RPH200000000	PHENOLIC DISPERSION RESIN	N/A
RPH300000000	PHENOLIC RESIN	N/A
RPH400000000	ALKYD RESIN PHENOLIC	N/A
RPO100000000	CHLORINATED POLYOLFIN SOLUTION	N/A
RRO100000000	GUM ROSIN	9000-14-2
RRO200000000	ABEITETIC LEVOPLMARIAIC ACID	N/A
RRO300000000	SYNTHETIC RESIN	N/A
RRU100000000	VINYL RESIN	9003-20-7
RRU200000000	POLYVINYL BUTYRAL	27360-07-2

RAWCODE	CNAME	CAS
RRU400000000	ETHYLENE VINYL ACETATE COPOLYMER	N/A
RRU500000000	RUBBER	N/A
RRU600000000	CHLORINATED RUBBER	9006-03-5
RRU650000000	VINYL CHLORIDE/ ACETATE-COPOLYMER	N/A
RRU660000000	VINYL SOLUTION	N/A
RRU700000000	VINYL CHLORIDE VINYL ACETATE	N/A
RRU730000000	VINYL RESIN	N/A
RRU750000000	VINYL CHLORIDE/ACETATE RESIN	9003-22-9
RRU780000000	VINYL RESIN	9005-09-8
RRU800000000	POLYVINYL ACETATE & COPOLYMER	N/A
RRU810000000	VINYL ACETATE HOMOPOLYMER	9003-20-7
RRU820000000	POLYVINYL ACETATE & COPOLYMER	N/A
RRU900000000	STYRENE BUTADRENE POLYMER	60381-61-5
RRU910000000	VINYLTOLUENE ACRYLATE COPOLYMER	60381-65-5
RRU920000000	COPOLYESTER RESIN	51382-28-6
RSC150000000	ALKYD RESIN	N/A
RSC170000000	SILICONE RESIN	N/A
RSC200000000	POLYMETHYLPHENYLSILOXANE RESIN	N/A
RST100000000	RESIN SOLUTION	N/A
RTF100000000	PTFE	9002-84-0
RUDYRM-1	Resin solution generic	
RUDYRM-1SOL	ALKYD RESIN SOLIDS	N/A
RUG100000000	OHIO POLY 5/17/01 MO ALKYD	N/A
RUG110000000	ALKYD RESIN SOLUTION	N/A
RUR100000000	SYNTHETIC RESIN	N/A
RUR200000000	UREA FORMALDEHYDE RESIN	N/A
RVA100000000	OIL MODIFIED PHENOLIC VARNISH SOL.	N/A
RVA120000000	RESIN	N/A
RVA200000000	MOISTURE PROOF VARNISH	N/A
RVA300000000	NATURAL RESIN SOLUTION	N/A
RVA400000000	OLEORESINOUS VARNISH	N/A MIXTURE
RVT100000000	VINYL TOLUENE ALKYD	N/A MIXTURE
RWA100000000	ALKYD COPOLYMER	N/A
RWA200000000	WATER REDUCIBLE ALKYD	N/A
RWA300000000	ALKYD RESIN SOLUTION	N/A
RWA350000000	ALKYD RESIN SOLUTION	N/A

RAWCODE	CNAME	CAS
RWA400000000	ALKYD RESIN SOLUTION	N/A
RWA450000000	WATER DISP. ACRYLIC MOD. ALKYD	N/A
RWA470000000	RESIN SOLUTION	N/A
RWA500000000	ALKYD RESIN SOLUTION	N/A
RWE100000000	WATER REDUCIBLE EMULSION	N/A
RWE150000000	L/V WATER REDUCIBLE EMULSION	N/A
RWE200000000	WATER REDUCIBLE EMULSION	N/A
RWE300000000	WATER REDUCIBLE EMULSION	N/A
RWE330000000	RESIN COMPOUND	NA
RWE350000000	WATER REDUCIBLE EMULSION	N/A
RWE380000000	ACRYLIC POLYMER	N/A MIXTURE
RWE390000000	ACRYLIC POLYMER	N/A MIXTURE
RWE400000000	WATER REDUCIBLE EMULSION	N/A
RWE410000000	ACRYLIC POLYMER EMULSION	N/A MIXTURE
RWE420000000	ACRYLIC EMULSION	N/A
RWE440000000	ACRYLIC STYRENE COPOLYMER	N/A
RWE450000000	EMULSION	N/A
RWE460000000	WATER-BORNE ACRYLIC COPOLYMER	N/A
RWE470000000	ACRYLIC EMULSION	N/A
RWE480000000	ACRYLIC COPOLYMER EMULSION	N/A
RWE485000000	W/B ACRYLIC RESIN	N/A MIXTURE
RWE490000000	ACRYLIC COPOLYMER EMULSION	7664-41-7
RWE500000000	POLYVINYL ACETATE EMULSION	N/A
RWE550000000	STYRENE-ACRYLATE POLYMER EMULSION	N/A
RWE700000000	W/R EPOXY ESTER	N/A
RWE800000000	VINYL/ACRYLIC COPOLYMER EMULSION	N/A
RWE900000000	ACRYLIC POLYMER EMULSION	N/A
RWR100000000	WRINKLE ALKYD SOLUTION	N/A
RWR200000000	WRINKLE VARNISH	N/A
RWS100000000	WR SHORT OIL ALKYD	N/A MIXTURE
RWU500000000	W/B URETHANE H/S RESIN	N/A MIXTURE
RWX100000000	CHLORINATED PARAFFIN	63449-39-8
RWX200000000	CHLORINATED PARAFFIN	63449-39-8
RWX300000000	WAX	647251-1

The surface area (measuring 23'X 15.542' X .5') is paved with concrete. Surface run-off and potential spills can be intercepted by the dikes and contained. Leaks that may occur are immediately cleaned up. The concrete

lining is structurally sound and impermeable to the passage and chemical attack of the stored substances under prevailing storage conditions. The components of the secondary containment system (detention basin) are lined with concrete (an impermeable material). The lining is maintained in an impermeable condition and will:

1) protect ground water for sufficient time needed to cleanup and remove a leak up to the entire volume of the largest tank using the system;
2) allow the visual detection of leaks; and
3) be inspected daily.

The largest volume of potential hazardous material spillage/discharge has been estimated at 220 gallons based on current storage practices of "stacking" pallets with up to four (4), 55-gallon drums per pallet within the storage areas. Table 1 provides a containment area summary.

B) DRUM STORAGE AREA 2

DESCRIPTION and CONTAINMENT

Drum storage area 2 is bounded on the west, north and east by the building (See Site Plan) the south and a part of the east side are contained within a 6" dike. The materials stored in this area are pigment dispersions made in the factory using any of the resins from drum storage area 1 mixed with pigment and then used in the formulations to provide the color in the paint. The dispersions which are stored here vary depending on the need in the factory. There is also some finished paint which is stored in drums in this area that was used by customers but they seem to have stopped purchasing the material. It is finished paint but considered dead stock and we are using it slowly as a raw material when compatible in the manufacture of new paint batches. The surface area (measuring 14.875'X 28.583' X .5') is paved with concrete. Surface run-off and potential spills can be intercepted by the dikes and contained. Leaks that may occur are immediately cleaned up. The concrete lining is structurally sound and impermeable to the passage and chemical attack of the stored substances under prevailing storage conditions. The components of the secondary containment system (detention basin) are lined with concrete (an impermeable material). The lining is maintained in an impermeable condition and will:

1) protect ground water for sufficient time needed to cleanup and remove a leak up to the entire volume of the largest tank using the system;
2) allow the visual detection of leaks; and
3) be inspected daily.

The largest volume of potential hazardous material spillage/discharge has been estimated at 220 gallons based on current storage practices of "stacking" pallets with up to four (4), 55-gallon drums per pallet within the storage areas.

Container	Volume in gallons	Total volume gallons	Type	Largest volume gal.	Volume of 6" rain gal.	Total Storage excess capacity in gallons	Containment material
Drums	55	2092.73073	D	220	12.89	2037.73072711	Concrete

C) DRUM STORAGE AREA 3

DESCRIPTION and CONTAINMENT

Drum storage area 3 is the Drum Storage pad marked as area 8 (See Site Plan) it is contained within a 6" dike. The surface area (measuring 29.167'X 89.5' X .5') is paved with concrete. Surface run-off and potential spills can be intercepted by the dikes and contained. Leaks that may occur are immediately cleaned up. The concrete lining is structurally sound and impermeable to the passage and chemical attack of the stored substances under prevailing storage conditions. The components of the secondary containment system (detention basin) are lined with concrete (an impermeable material). This area measures 35' x 18' x 3'. The lining is maintained in an impermeable condition and will:

1) protect ground water for sufficient time needed to cleanup and remove a leak up to the entire volume of the largest tank using the system;
2) allow the visual detection of leaks; and
3) be inspected daily.

The largest volume of potential hazardous material spillage/discharge has been estimated at 220 gallons based on current storage practices of "stacking" pallets with up to four (4), 55-gallon drums per pallet within the storage areas.

Container	Volume in gallons	Total volume gallons	Type	Largest volume gal.	Volume of 6" rain gal.	Total Storage excess capacity in gallons	Containment material
Drums	55	9763.06991	D	220	174.5	9368.56991	Concrete

Tank Truck Unloading

All tank loading and unloading is done on the south side of the building in the diked loading/unloading area. All lines and outlets are visually inspected prior to beginning and after completion of the fill process(per N.J.A.C. 7:1E-2.3(b)&(c)). Wheel chocks are provided to prevent tank truck departure before complete disconnection of the transfer line(s)(per N.J.A.C. 7:1E-2.3(d)). The above ground tanks in the tank farms and the individual tanks are remotely filled from above grade fill pipes located within the diked areas. All hose connections are completed within the diked areas. Tank filling from delivery trucks is closely monitored throughout the filling process)(per N.J.A.C. 7:1E-2.3(e)). Two men are posted by the fill/pump station. One on the tank for visual inspection. The tank is measured prior to the filling process to determine that there is sufficient capacity not to exceed 90% of the capacity of the tank. Two (2) operators are present during all transfer procedures. Secondary means of overflow prevention is by means of visual inspection and/or communication system. In order to comply with the communication option two (2) VHF FM Business Band Transceiver for hand held communication were purchased. They have frequency coverage of 151.250 to 156.255 Mhz. We use band 154.600 Mhz. The transceivers are used so that communication between the operators is clear and instant.

CONTAINMENT

The largest potential hazardous material spill volume)(per N.J.A.C. 7:1E-4.2(d)2) has been estimated at 6,500 gallons. This potential spill volume is based on the largest bulk liquid transport truck which could unload in this area. The components of the secondary containment system)(per N.J.A.C. 7:1E-4.2(d) and N.J.A.C. 7:1E-2.3(a))) (drainage sump and detention basin) are lined with concrete (an impermeable material). The lining is maintained in an impermeable condition and will:

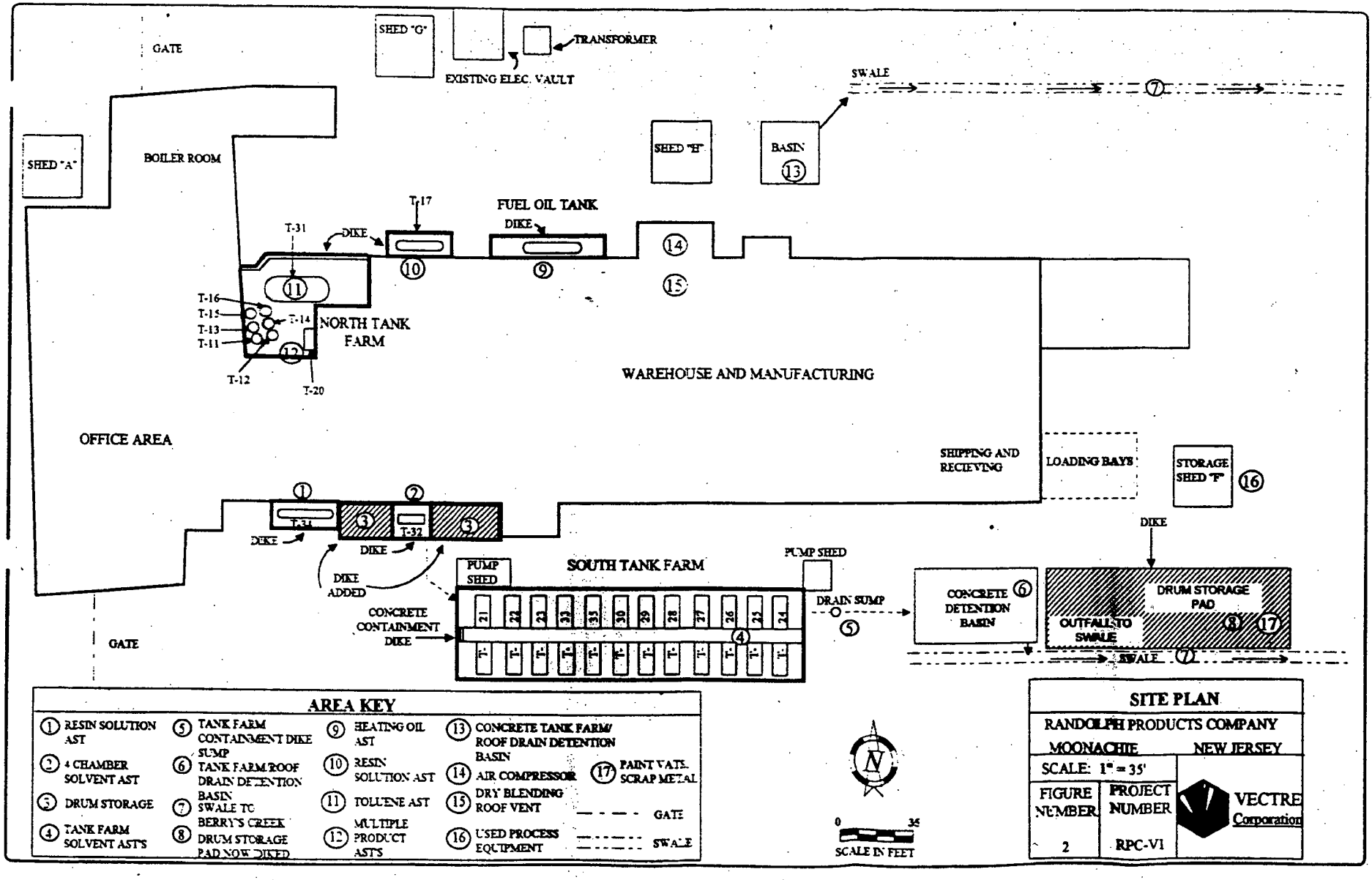
1) Protect ground water for sufficient time needed to cleanup and remove a leak up to the entire volume of the largest tank using the system;
2) Allow the visual detection of leaks; and

3) Be inspected daily.

Size of the containment area is on the South side of the building measures 35' x 18' x 3' making it capable of holding 14,137.20 gallons of material.

South Containment Area	Total volume gallons	Largest volume	Volume of 6" rain gal.	Total Storage excess capacity in gallons	Containment material
35'x18'x3'	14,137.20	1,000.00	42.11	13,095.09	Concrete

All other raw materials are stored in the raw material warehouse area in the rear of the building, the external storage building on the rear of the property or in the departments in which they are used.



AREA KEY

1. RESIN SOLUTION AST
2. 4 CHAMBER SOLVENT AST
3. DRUM STORAGE
4. TANK FARM SOLVENT AST'S
5. TANK FARM CONTAINMENT DIKE
6. SUMP TANK FARM ROOF DRAIN DETENTION
7. BASIN SWALE TO BERRY'S CREEK
8. DRUM STORAGE PAD NOW DIKED
9. HEATING OIL AST
10. RESIN SOLUTION AST
11. TOLUENE AST
12. MULTIPLE PRODUCT ASTS
13. CONCRETE TANK FARM/ ROOF DRAIN DETENTION BASIN
14. AIR COMPRESSOR
15. DRY BLENDING ROOF VENT
16. USED PROCESS EQUIPMENT
17. PAINT WASTE SCRAP METAL

GATE

SWALE

N

0 35

SCALE IN FEET

SITE PLAN

RANDOLPH PRODUCTS COMPANY

MOONACHIE NEW JERSEY

SCALE: 1" = 35'

FIGURE NUMBER	PROJECT NUMBER
2	RPC-V1

VECTRE Corporation

11) DOT approved 325-gallon capacity shipping containers are supplied by a disposal company. The are owned by Marisol 125 Factory Lane Middlesex, NJ 08846 732 469-5100. The containers are used to store wastes generated during processing. They are periodically removed and replaced by empty containers supplied by the waste disposal company. The containers are stored in a dike area underlain by concrete. The concrete is structurally sound and impermeable to the passage or chemical attack of stored substances as under prevailing storage conditions. The largest vessel that could potentially discharge a hazardous liquid is a 325-gallon shipping container with a maximum volume of 325 gallons.

The components of the secondary containment system (diked area) are lined with concrete (an impermeable material). The lining is maintained in an impermeable condition and will:

1) protect ground water for sufficient time needed to cleanup and remove a leak up to the entire volume of the largest tank using the system;
2) allow the visual detection of leaks; and
3) be inspected daily.

The portable shipping tanks are used in the processing area are in accordance with NFPA 30, *Flammable and Combustible Liquids Code,* and the construction complies with NFPA 386, *Portable Shipping Tanks.* These tanks are used for the removal of waste material. After being filled in the process area they are removed to the rear drum storage area.

12) W.G. Randolph, John H. Randolph

13) As far as this manufacturing facility there have been none.

14) Copy of form.

* * *

Instructions: As instructed in Question 14, please complete this form by marking the appropriate spaces. Indicate whether each of the chemicals listed has ever been released from the Site to the Berry's Creek Study Area, including creeks, ditches, or other water bodies, or wetlands. Follow additional instructions below. Return the completed form along with your other responses to the Request for Information in the Matter of the Berry's Creek Study Area, Bergen County, New Jersey. N/A signifies no information available.

	Yes	No	N/A
acenaphthene		X	
acenaphthylene		X	
anthracene		X	
aluminum		X	
antimony		X	
arsenic		X	
benz(a)anthracene		X	
benzene		X	
benzo(a)pyrene		X	
benzo(b)fluoranthene		X	
benzo(g,h,i)perylene		X	
benzo(k)fluoranthene		X	
bis(2-ethylhexyl)phthalate		X	
butyl benzyl phthalate		X	
cadmium		X	
chlorinated dibenzo-p-dioxins (if "yes", please list specific dioxin compounds on a separate sheet)		X	
chlorinated dibenzofurans (if "yes", please list specific compounds on a separate sheet)		X	
chlorobenzene		X	
chloroform		X	
chromium		X	
chrysene		X	
copper		X	
cyanide		X	
dibenz(a,h)anthracene		X	
dichlorobenzene		X	
1,2-dichloroethene		X	
di-n-butyl phthalate		X	
1,2-dichlorobenzene		X	
1,2-dichloroethane		X	
dieldrin		X	
di-n-octyl phthalate		X	
ethylbenzene		X	
fluoranthene		X	

	Yes	No	N/A
fluorene		X	
hexachlorobenzene		X	
indeno(1,2,3-cd)pyrene		X	
lead		X	
manganese		X	
mercury		X	
methylene chloride		X	
methyl ethyl ketone		X	
methyl mercury		X	
2-methylnaphthalene		X	
naphthalene		X	
nickel		X	
pentachlorophenol		X	
petroleum hydrocarbons		X	
phenanthrene		X	
phenol		X	
polychlorinated biphenyls (if "yes" please list specific congeners and aroclors on a separate sheet)		X	
polycyclic aromatic hydrocarbons (if "yes", please list specific compounds on a separate sheet, if not listed on this page)		X	
pyrene		X	
selenium		X	
silver		X	
1,1,2,2-tetrachloroethane		X	
tetrachloroethylene		X	
thallium		X	
toluene		X	
1,2-trans-dichloroethylene		X	
1,1,1-trichloroethane		X	
trichloroethylene		X	
vinyl chloride		X	
xylene		X	
zinc		X	

15) No industrial waste was treated, stored, handled, or disposed of by Randolph Products for any of our customers.

16) N/A

17) I have no knowledge of any companies or sources that sent industrial wastes to the site.

18) John H. Randolph (President), Linda Randolph (Vice President)
13 Baldwin Road
Saddle River, NJ 07458

When the company was sold to C&C Ventures all contents of building were turned over to the new owners. There has been a thorough cleaning of old equipment, files and office records such as purchase orders, sales orders, invoices, customer records, etc. This cleaning was done without my participation or knowledge. There may have been inadvertent removal of some documents pertinent to your investigation that I will not be able to provide due to this disposal.

Sincerely,

John H. Randolph

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

State of NJ

County of BERGEN

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I am also aware that my company is under a continuing obligation to supplement its response to EPA's Request for Information if any additional information relevant to the matters addressed in EPA's Request for Information or the company's response thereto should become known or available to the company.

JOHN H. RANDOLPH
NAME (print or type)

TITLE (print or type)

SIGNATURE

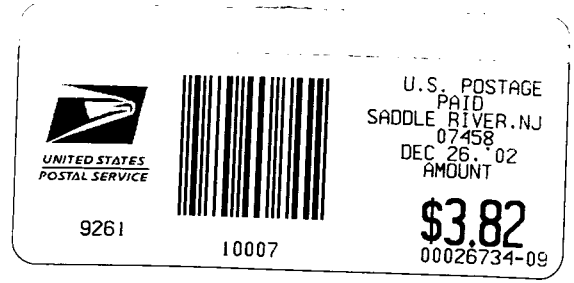
Sworn to before me this

26 day of December 2002

Notary Public

My Comission Expires 6/21/2007

TS CO.
fth Street
x 830
, N.J. 07072-0830



Seth Hyacobel
Remedial Project Mgr
USEPA
Region II
Emergency & Remedial Response Div
290 Broadway, 19th floor
New York, NY 10007-1866